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May 21, 2008

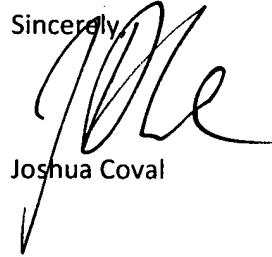
United States Patent and Trademark Office
Commissioner for Patents
PO Box 1450
Alexandria, Virginia 22313-1450

Dear Sir or Madam,

This letter is in reference to Patent Application No. 10/716,391. We have spoken with Jason M. Borlinghaus in reference to a Restriction Requirement received last fall. Per his recommendation, we would like to proceed with Inventions II (Claims 12-20) and IV (Claims 40-49 and 54-58) as subcombinations that are not distinct and remove our claims behind Inventions I (Claims 1-11 and 21-24) and III (Claims 25-39 and 50-53). As I described to him, Inventions II and IV are the exact same idea applied in Invention II to portfolio *holdings* and in Invention IV to portfolio *transactions*.

Please let me know if you have any questions and/or what additional fees are required. Additionally, please address all further correspondence to the address below. Randy and I are no longer represented by Foley Hoag LLP on this application.

Sincerely,


Joshua Coval

JC:rv